1	STEVEN W. MYHRE Acting United States Attorney		
2	District of Nevada ELHAM ROOHANI		
3	Nevada Bar No. 12080 Assistant United States Attorney		
4	501 Las Vegas Boulevard South; Suite 1100 Las Vegas, Nevada 89101 Phone: 702-388-6336		
5	Email: elham.roohani@usdoj.gov		
6	UNITED STATES DISTRICT COURT		
7	DISTRICT OF NEVADA -0Oo-		
8	UNITED STATES OF AMERICA, )		
9	Plaintiff,	Case No: 2:17-mj-839-CWH	
10	vs.	STIPULATION FOR PROTECTIVE ORDER	
11	JAMIE JOE DULUS,		
12	Defendant.		
13	<u> </u>		
14	IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre, Acting		
15	United States Attorney, and Elham Roohani, Assistant United States Attorney, counsel for the		
16	United States of America, and Jack E. Buchanan, Esq. counsel for the Defendant JAMIE JOE		
17	DULUS, that a Protective Order regarding all discovery in the above captioned case be entered by		
18	the Court to protect the privacy of the Defendant and the victims in this case.		
19	DATED this 5th day of September, 2017.		
20			
21	STEVEN W. MYHRE, Acting United States Attorney	JACK E. BUCHANAN, ESQ.	
22	By <u>: /s/ Elham Roohani</u> ELHAM ROOHANI	By: <u>/s/ Jack E. Buchanan</u> JACK E. BUCHANAN, ESQ.	
23	Assistant United States Attorney	Counsel for the Defendant	
24			

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,	) ) <b>Case No:</b> 2:17-mj-839-CWH
Plaintiff,	) ) <u>PROTECTIVE ORDER</u>
Vs.	) REGARDING DISCOVERY
JAMIE JOE DULUS,	)
Defendant.	) ) )

Based on the agreement of the parties for a Protective Order, and good cause appearing therefore, the Court hereby:

- 1. Grants a Protective Order to limit disclosure to the public, or any third party not directly related to this litigation, information/documents received pursuant to the order, relating to discovery in *United States v. Jamie Joe Dulus*, No. 2:17-mj-839-CWH (hereinafter referred to as the "protected information").
- 2. Further orders that without leave of Court, the parties to this matter, defined herein for the matters of this protective order as the Government, and counsel for the defendant, shall not:
  - make copies for, or allow copies of any kind to be made by any other person of the protected information;
  - b. permit dissemination of the protected information at the Nevada Southern Detention Center jail facility, or any other detention facility where the defendant is housed; allow any other person to read the protected information, or reveal orally or in writing any of the protected information to a non-party to this litigation; and

- use of the protective information for any other purpose other than preparing to
  defend against the charges in this indictment or any further superseding indictment
  arising out of this case; and
- Further, the Court orders that the parties inform the Court any person to whom
  disclosure may be made pursuant to this order of the existence and terms of this Court's
  order.
- 4. Finally, the Court orders that upon conclusion of this action, the defendant's attorney return to the United States, or destroy and certify to government counsel the destruction of the protected information, within a reasonable time, not to exceed thirty days after the last appeal is final.
- 5. This protective order shall not be construed to prevent either party from using the protected document at trial, should the court deem the protected document admissible.

Dated this \_ September 7 \_\_\_\_\_, 2017.

IT IS SO ORDERED:

THE HONORABLE CARL W. HOFFMAN United States Magistrate Judge